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REMARKS

Applicants have studied the Office Action dated March 9, 2004. Applicants respectfully request entry of this response under the provisions of 37 C.F.R. § 1.116(a) in that it places the application and claims in condition for allowance or, at least, presents the application in better form for appeal. It is submitted that the application is in condition for allowance. Claims 1-26 are pending. Reconsideration and allowance of the pending claims in view of the following remarks are respectfully requested.

Claims 1-9 and 12-24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown et al. (U.S. Patent No. 5,913,208). Claims 10, 11, 25, and 26 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Brown et al. in view of "Microsoft Press Computer Dictionary" (Microsoft Press, 1997, p. 309). These rejections are respectfully traversed.

Applicants are filing a Declaration under 37 C.F.R. § 1.131 (see Attachment) to establish that the invention claimed in the present application was reduced to writing in the United States prior to June 15, 1999. Thus, the invention claimed in the present application was invented prior to June 15, 1999. The Brown reference has a 35 U.S.C. § 102(a) date of June 15, 1999, which is after the invention claimed in the present application was invented. Therefore, Brown cannot properly be cited against the present application as a prior art reference in a rejection under 35 U.S.C. § 102(a) or an obviousness rejection under 35 U.S.C. § 102(a)/103(a).

Additionally, the present application was not filed more than one year before the June 15, 1999 issue date of the Brown reference. Therefore, Brown cannot properly be cited against the present application as a prior art reference in a rejection under 35 U.S.C. § 102(b) or an obviousness rejection under 35 U.S.C. § 102(b)/103(b).

Further, the present application was filed after November 29, 1999, so the new version of 35 U.S.C. § 103(c) applies to the present application. Applicants submit that under the new version of 35 U.S.C. § 103(c), the Brown reference cannot be cited against the present

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application in an obviousness rejection under 35 U.S.C. § 102(e)/103(a). More specifically, the subject matter of the Brown reference cited by Examiner and the claimed invention were, at the time the invention was made, commonly owned or subject to an obligation of assignment to the same person. The Examiner can check the assignment records to determine common ownership of the subject matter of the Brown reference and the claimed invention. As shown in those records, the Brown reference and the claimed invention have been and are currently assigned to the same common owner: International Business Machines Corporation. Therefore, under the new version of 35 U.S.C. § 103(c), the Brown reference cannot be used in an obviousness rejection under 35 U.S.C. § 102(e)/103(a). See MPEP § 706.02(I).

Because (a) the Brown reference has a 35 U.S.C. § 102(a) date that is after the invention claimed in the present application was invented (as established by the attached Declaration), (b) the present application was not filed more than one year before the June 15, 1999 issue date of the Brown reference, and (c) the subject matter of the Brown reference and the claimed invention were, at the time the invention was made, commonly owned or subject to an obligation of assignment to the same person, the Brown reference can only qualify as prior art under 35 U.S.C. § 102(e). Accordingly, Applicants submit that the Brown reference cannot be cited against the present application in an obviousness rejection under 35 U.S.C. § 103(a). Further, Applicants submit that, by itself, the "Microsoft Press Computer Dictionary" reference fails to render the invention recited in claims 1-26 obvious under 35 U.S.C. § 103(a). Therefore, it is respectfully submitted that the rejections of claims 1-26 under 35 U.S.C. § 103(a) should be withdrawn.

In view of the foregoing, it is respectfully submitted that the application and the claims are in condition for allowance. Reexamination and reconsideration of the application are requested.

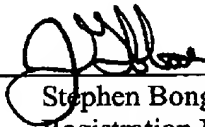
If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is invited to call the undersigned attorney at (561) 989-9811 should the Examiner believe a telephone interview would advance the prosecution of the application.

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Respectfully submitted,

Date: July 9, 2004

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